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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

Lisa Liberi, et al., )  
Plaintiffs, )  
vs. )  
Orly Taitz, et al., )  
Defendants )  
) **OBJECTIONS TO THE  
DECLARATION OF RYAN  
RUSTIG CONCERNING  
ANOTHER PENNSYLVANIA  
ACTION BY THE PLAINTIFFS**  
)  
) Before Hon. Andrew J. Guilford,  
) Judge, United States District Court

Date: 3 February 2014

Time: 10:00 am

## Courtroom: 10D

1           **OBJECTION TO THE ENTIRE DECLARATION OF RYAN LUSTIG:**

2  
3       Irrelevant. This document has nothing to do with this case; it concerns  
4       subpoenas another case by the Plaintiffs, Ostella, et al *vs. IRB et al.* 2:12-cv-  
5       07002-TON. It merely demonstrates that the Plaintiffs are trying to obtain  
6       discovery from Todd Sankey, The Sankey Firm, Inc., and Neil Sankey despite  
7       that the discovery cutoff in this matter passed long ago. Further with regard  
8       to that Pennsylvania action, Todd Sankey, The Sankey Firm, Inc. and Neil  
9       Sankey filed a motion to dismiss for lack of jurisdiction which was granted  
10      and the case was dismissed as to them. [Further, the declarant's testimony in  
11      paragraph 6 is false but is not disputed herein because it is not at issue to or  
12      relevant to this case.]

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14           **OBJECTION TO INDIVIDUAL PARAGRAPHS:**

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16       Objection to Paragraph 1.

17       Irrelevant.

18  
19       Objection to Paragraph 2.

20       Irrelevant.

21       States declarant's legal opinion regarding "independent contractor" status  
22       with no foundation nor basis.

23  
24       Objection to Paragraph 3.

25       Irrelevant.

26  
27       Objection to Paragraph 4.

28       Irrelevant.

1 States declarant's legal opinion regarding "proper service" with no foundation  
2 nor basis.

3  
4 Objection to Paragraph 5.

5 Irrelevant.

6 States declarant's legal opinions with no foundation nor basis.

7  
8 Objection to Paragraph 6.

9 Irrelevant.

10 States declarant's opinion, including legal opinions concerning "willingly  
11 accepted" and "on behalf of The Sankey Firm, Inc.", all with neither  
12 foundation nor basis.

13  
14 Respectfully submitted on this 25<sup>th</sup> day of January 2014,

15  
16 **/s/ Marc Steven Colen**

17 The Colen Law Firm  
18 Attorney for Defendants,  
19 Todd Sankey and The Sankey Firm, Inc.